

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARTHINUS LOURENS,

CIVIL ACTION NO. 1:25-cv-00905-TRJ

Plaintiff,

**CERTIFICATE OF INTERESTED
PERSONS**

v.

&

**DELTA AIR LINES, INC.
and ENDEAVOR AIR, INC.,**

**CORPORATE DISCLOSURE
STATEMENT**

Defendants.

**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

- (1) The undersigned counsel of record for a party or proposed intervenor to this action certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

Plaintiff, Marthinus Lourens;

Defendant, Delta Air Lines, Inc; and

Defendant, Endeavor Air, Inc.

- (2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:

(A) Watts Firm LLP
610 River Valley Road
Atlanta, Georgia 30328

811 Barton Springs Road, 725
Austin, Texas 78704

- (B) DJC Law, PLLC
1012 West Anderson Lane
Austin, Texas 78757
- (C) Carabin Shaw
875 E. Ashby Pl #110
San Antonio, Texas 78212
- (D) Hinshaw & Culbertson, LLP
151 North Franklin Street
Suite 2500
Chicago, IL 60606

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

Russell T. Abney, Local Counsel for Plaintiff, Watts Law Firm, LLP;

Mikal Watts, Counsel for Plaintiff, Watts Law Firm, LLP;

Andres C. Pereira, Counsel for Plaintiff, DJC Law, PLLC;

Mark Pierce, Counsel for Plaintiff, DJC Law, PLLC;

David Bizar, Counsel for Plaintiff, DJC Law, PLLC;

James Michael Shaw, Counsel for Plaintiff, Carabin Shaw; and

Michael G. McQuillen, Counsel for Defendants, Hinshaw & Culbertson, LLP.

(4) [For every action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a).]
The undersigned further certifies that the following is a full and complete list of the citizenship* of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

* Allegations of an individual's residence do not enable the Court to determine an individual's citizenship. *Travaglio v. Am. Express Co.*, 735 F.3d 1266, 1269 (11th Cir. 2013). For purposes of diversity jurisdiction, citizenship is equivalent to domicile, which is a party's "true, fixed, and permanent home and principal establishment, and to which he has the intention of returning whenever he is absent therefrom." *McCormick v. Aderholt*, 293 F.3d 1254, 1257–58 (11th Cir. 2002) (quoting *Mas v. Perry*, 489 F.2d 1396, 1399 (5th Cir. 1974)). "[A] limited partnership is a citizen of each state in which any of its partners, limited or general, are citizens." *Rolling Greens MHP, L.P. v. Comcast SCH Holdings L.L.C.*, 374 F.3d 1020, 1021 (11th Cir. 2004) (citing *Carden v. Arkoma Assocs.*, 494 U.S. 185, 195-196 (1990)). A limited liability company, like other unincorporated entities, "is a citizen of any state of

This case is based upon 28 U.S.C. § 1331.

Submitted this 28th day of February 2025.

By: /s/ Russell T. Abney

Russell T. Abney (Ga. Bar No. 000875)

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By: /s/ Andres C. Pereira

Andres C. Pereira, *Pro Hac Vice*

Mark Pierce (*pro hac vice pending*)

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which a member of the company is a citizen.” Rolling Greens MHP, 374 F.3d at 1022. A traditional trust is a citizen of the state of which its trustee is a citizen, not its beneficiaries. Alliant Tax Credit 31, Inc. v. Murphy, 924 F.3d 1134, 1143 (11th Cir. 2019).